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11 Attorneys for Specially-Appearing Defendant OLD REPUBLIC
12 TITLE INSURANCE GROUP, INC. and Defendants
13 OLD REPUBLIC NATIONAL TITLE INSURANCE
14 COMPANY and OLD REPUBLIC TITLE COMPANY OF
15 NEVADA

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 DEUTSCHE BANK NATIONAL TRUST
19 COMPANY, AS TRUSTEE FOR MORGAN
20 STANLEY DEAN WITTER CAPITAL I
21 INC. TRUST 2003-NC2, MORTGAGE
22 PASS-THROUGH CERTIFICATES, SERIES
23 2003-NC2,

24 Plaintiff,

25 vs.

26 OLD REPUBLIC TITLE INSURANCE
27 GROUP, INC., OLD REPUBLIC
28 NATIONAL TITLE INSURANCE
COMPANY; OLD REPUBLIC TITLE
COMPANY OF NEVADA; DOE
INDIVIDUALS I through X; and ROE
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:21-cv-01466-GMN-DJA

**STIPULATION AND PROPOSED
ORDER TO EXTEND DEFENDANTS'
TIME TO RESPOND TO COMPLAINT**

(First Request)



Defendants Old Republic National Title Insurance Company (“Old Republic”) and Old Republic Title Company of Nevada (“Old Republic Agency”) and Specially-Appearing Defendant Old Republic Title Insurance Group, Inc. (“ORTIG”) (collectively, “Defendants”) and plaintiff Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2003-NC2, Mortgage Pass-Through Certificates, Series 2003-NC2 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate as follows:

WHEREAS, Deutsche Bank commenced the action by filing a Complaint on August 5, 2021, in the Eighth Judicial District Court for the State of Nevada, Clark County (Case No. A-21-839034-C);

WHEREAS, on August 6, 2021, Old Republic filed a Petition of Removal with this Court, based upon diversity jurisdiction (ECF No. 1);

WHEREAS, on August 18, 2021, Deutsche Bank served Old Republic Agency with the complaint pursuant to the executed Affidavit of Service filed on August 24, 2021 (ECF No. 7);

WHEREAS, on August 25, 2021, Deutsche Bank served Old Republic with the complaint pursuant to the executed Affidavit of Service filed on August 31, 2021 (ECF No. 9);

WHEREAS, on August 27, 2021, Deutsche Bank served ORTIG with the complaint pursuant to the executed Affidavit of Service filed on September 1, 2021 (ECF No. 10);

WHEREAS, Old Republic Agency’s response to the Complaint is due on September 8, 2021;

WHEREAS, Old Republic’s response to the Complaint is due on September 15, 2021;

WHEREAS, ORTIG’s response to the Complaint is due on September 17, 2021;

WHEREAS, Defendants are requesting an extension of time to respond to the Complaint to afford their counsel additional time to review, analyze and respond to Deutsche Bank’s Complaint;

WHEREAS, Deutsche Bank has agreed to extend Defendants’ time to respond to the Complaint so that all of Defendants’ responses to the Complaint are due on or before October 8, 2021; and

1 **WHEREAS**, this is the first stipulation for an extension of Defendants' time to respond to
2 the complaint.

3 Now, therefore, the Parties hereto, by and through their counsel of record, hereby stipulate
4 and agree as follows:

- 5 1. Defendants shall respond to the complaint on or before October 8, 2021.
6 2. Defendants intend to preserve their rights and do not expressly waive any and all
7 defenses listed in Fed. R. Civ. P. 12(b).

8
9 DATED this 7th day of September, 2021

DATED this 7th day of September, 2021

10 WRIGHT FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

11
12 */s/-Lindsay D. Robbins*

/s/-Sophia S. Lau

13 By: _____

By: _____

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18 DEUTSCHE BANK NATIONAL
19 TRUST COMPANY, AS TRUSTEE
20 FOR MORGAN STANLEY DEAN
21 WITTER CAPITAL I INC. TRUST
2003-NC2, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES
2003-NC2

Attorneys for Specially-Appearing Defendant
OLD REPUBLIC TITLE INSURANCE
GROUP, INC. and Defendants
OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY and OLD
REPUBLIC TITLE COMPANY OF
NEVADA

22
23 **ORDER**

24 **IT IS SO ORDERED:**

25
26 Dated: September 8, 2021
27 _____

By: 
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

